

1 **REMARKS**

2 Claims 1, 5, 16, 28 and 29 are amended. Claims 1, 3-16, and 18-42 are  
3 pending. In view of the following remarks, Applicant respectfully requests the  
4 Office withdraw its rejections and forward the application on to issuance.  
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6 **§ 101 Rejections**

7 **Claims 1, 3-16 and 18-27** stand rejected under 35 U.S.C. § 101. In this  
8 regard, the Office argues that these claims are directed to non-statutory subject  
9 matter. For the reasons set forth in Applicant's previous response, filed February  
10 13, 2007, Applicant disagrees with the Office's arguments. Nevertheless, in the  
11 interest of advancing the prosecution of this matter, Applicant has made  
12 clarifying amendments that the Office has agreed will result in these rejections be  
13 withdrawn. Therefore, for at least this reason, these claims are allowable.  
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15 **§ 112 Rejections**

16 **Claims 1, 3-16 and 18-42** stand rejected under 35 U.S.C. § 101. In this  
17 regard, the Office argues that the claim language "wherein calls to the application  
18 ... intermediate supported language" is not supported by the specification.  
19 Applicant disagrees with the Office's argument and submits that the specification  
20 is replete with excerpts that support this claim language. Nevertheless, in the  
21 interest of advancing the prosecution of this matter, Applicant has made  
22 clarifying amendments that the Office has agreed will result in these rejections be  
23 withdrawn. Therefore, for at least this reason, these claims are allowable.  
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1                    **§ 103 Rejections**

2                    **Claims 1, 3-16 and 18-42** stand rejected under 35 U.S.C. § 103(a) over a  
3 publication by Willie entitled “Presenting C#” (hereinafter “Willie”) in view of a  
4 publication by Perry entitled “Teach Yourself Visual Basic 6 in 21 Days”  
5 (hereinafter “Perry”).

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7                    **The Claims**

8                    **Claim 1**, as amended [added language in bold italics], recites a software  
9 architecture *embodied on one or more computer-readable storage media, the*  
10 *software architecture* for a distributed computing system comprising:

- 11
- 12                    • an application configured to handle requests submitted by remote  
                     devices over a network; and
  - 13                    • an application program interface *organized into multiple root*  
14 *namespaces, the application program interface* to present  
15 functions used by the application to access network and computing  
16 resources of the distributed computing system, wherein calls to the  
17 application program interface are handed to a common language  
runtime layer *supporting* applications written in *one or more*  
18 different languages *and translated* into an intermediate supported  
language, the application program interface comprising various  
19 types related to constructing user interfaces, *wherein the types*  
20 *belong to a group assigned a group name associated with one of*  
*the root namespaces, and wherein each of the types is referenced*  
*by a hierarchical name comprising a top level identifier prefixed*  
*to the group name assigned to the group.*

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22                    In making out the rejection of this claim, the Office relies on the  
23 teachings of Willie and Perry, and argues that it would have been obvious to  
24 integrate the teachings of these references.  
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1 Applicant respectfully disagrees with the Office's argument and submits  
2 that the Office has not established a *prima facie* case of obviousness.  
3 Nevertheless, in the interest of advancing the prosecution of this claim,  
4 Applicant has amended this claim to clarify, among other things, that the  
5 application program interface recited in the claim is "organized into multiple  
6 root namespaces" and that "the types belong to a group assigned a group name  
7 associated with one of the root namespaces, and wherein each of the types is  
8 referenced by a hierarchical name comprising a top level identifier prefixed to the  
9 group name."

10 Neither Willie nor Perry discloses or suggests such subject matter.  
11 Hence, for at least this reason, this claim is allowable.

12 **Claims 3-4 and 41** depend from claim 1 and are allowable as depending  
13 from an allowable base claim. These claims are also allowable for their own  
14 recited features which, in combination with those recited in claim 1, are neither  
15 disclosed nor suggested in the references of record, either singly or in  
16 combination with one another.

17 **Claim 5**, as amended [added language in bold italics], recites an  
18 application program interface embodied on one or more computer readable  
19 *storage* media, comprising: multiple types related to constructing user interfaces,  
20 individual types *being associated with one or more groups and being referenced*  
21 *by one or more hierarchical names, wherein each hierarchical name includes a*  
22 *top level identifier prefixed to a group name assigned to one of the one or more*  
23 *groups, the types* comprising classes which represent managed heap allocated  
24 data that has reference assignment semantics, interfaces that define a contract that  
25 other types can implement, delegates that are object oriented function pointers,

1 structures that represent static allocated data that has value assignment semantics  
2 and enumerations which are value types that represent named constants, wherein  
3 the application program interface is associated with a common language runtime  
4 layer *supporting* applications written in *one or more of several* different  
5 languages *and translated* into *an* intermediate language supported by the  
6 common runtime layer.

7 In making out the rejection of this claim, the Office relies on the  
8 teachings of Willie and Perry and argues it would have been obvious to  
9 integrate the teachings of these references.

10 Applicant respectfully disagrees with the Office's argument and submits  
11 that the Office has not established a *prima facie* case of obviousness.  
12 Nevertheless, in the interest of advancing the prosecution of this claim,  
13 Applicant has amended this claim to clarify, among other things, that individual  
14 types are "associated with one or more groups" and are "referenced by one or  
15 more hierarchical names, wherein each hierarchical name includes a top level  
16 identifier prefixed to a group name assigned to one of the one or more groups".

17 Neither Willie nor Perry discloses or suggests such subject matter.  
18 Hence, for at least this reason, this claim is allowable.

19 **Claims 6-15** depend from claim 5 and are allowable as depending from an  
20 allowable base claim. These claims are also allowable for their own recited  
21 features which, in combination with those recited in claim 5, are neither disclosed  
22 nor suggested in the references of record, either singly or in combination with one  
23 another.

24 **Claim 16**, as amended [added language in bold italics], recites a  
25 distributed computer software architecture *embodied on one or more computer-*

1 *readable storage media, the distributed computer software architecture*  
2 comprising:

- 3
- 4 • one or more applications configured to be executed on one or more  
5 computing devices, the applications handling requests submitted from  
6 remote computing devices;
- 7 • a networking platform to support the one or more applications;
- 8 • an application programming interface to interface the one or more  
9 applications with the networking platform, the application  
10 programming interface comprising various types related to constructing  
11 user interfaces, *individual types being associated with one or more*  
12 *groups and being referenced by one or more hierarchical names,*  
13 *wherein each of the hierarchical names includes a top level identifier*  
14 *prefixed to a group name assigned to one of the one or more groups;*  
15 and
- 16 • a common language runtime layer *supporting* applications written in  
17 *one or more* different languages *and translated* into an intermediate  
18 language supported by the common runtime layer.

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20 In making out the rejection of this claim, the Office relies on the  
21 teachings of Willie and Perry and argues it would have been obvious to  
22 integrate the teachings of these references.

23 Applicant respectfully disagrees with the Office's argument and submits  
24 that the Office has not established a *prima facie* case of obviousness.  
25 Nevertheless, in the interest of advancing the prosecution of this claim,  
Applicant has amended this claim to clarify, among other things, that individual  
types are "associated with one or more groups" and are "referenced by one or  
more hierarchical names, wherein each of the hierarchical names includes a top  
level identifier prefixed to a group name assigned to one of the one or more  
groups".

1 Neither Willie nor Perry disclose or suggest such subject matter.  
2 Hence, for at least this reason, this claim is allowable.

3 **Claims 18-27 and 42** depend from claim 16 and are allowable as  
4 depending from an allowable base claim. These claims are also allowable for  
5 their own recited features which, in combination with those recited in claim 16,  
6 are neither disclosed nor suggested in the references of record, either singly or in  
7 combination with one another.

8 **Claim 28**, as amended [added language in bold italics], recites a computer  
9 system including one or more microprocessors and one or more software  
10 programs, the one or more software programs utilizing an application program  
11 interface to request services from an operating system, the application program  
12 interface including separate commands to request services comprising services  
13 related to constructing user interfaces, wherein the application program interface  
14 groups API functions into multiple namespaces that define a collection of classes  
15 which represent managed heap allocated data that has reference assignment  
16 semantics, interfaces that define a contract that other types can implement,  
17 delegates that are object oriented function pointers, enumerations which are value  
18 types that represent named constants and structures that represent static allocated  
19 data that has value assignment semantics, the application program interface being  
20 associated with a common language runtime layer *supporting* applications  
21 written in *one or more* different languages *and translated* into an intermediate  
22 language supported by the common runtime layer.

23 In making out the rejection of this claim, the Office relies on the teachings  
24 of Willie and Perry and argues it would have been obvious to integrate the  
25 teachings of these references "to get a full understanding [of] how to construct

1 user interface of the client application.” However, the Office fails to address the  
2 language “wherein the application program interface groups API functions into  
3 multiple namespaces that define...value assignment semantics,” as also recited in  
4 claim 28.

5 Applicant respectfully traverses this rejection and submits that the Office  
6 has not established a *prima facie* case of obviousness.

7 First, Applicant submits that the references do not collectively disclose all  
8 of the subject matter of claim 28. For example, Applicant fails to understand how  
9 the “RequestWebPage”, an exemplary class for retrieving a web page, in Willie  
10 can be equated with an “an application program interface to request services from  
11 an operating system, the application program interface including separate  
12 commands to request services comprising services related to constructing user  
13 interfaces” as claimed.

14 Furthermore, it appears that the Office has forgotten the claim language  
15 “wherein the application program interface groups API functions into multiple  
16 namespaces that define...value assignment semantics”. Nevertheless, Applicant  
17 has thoroughly reviewed the Willie and Perry references and submits that this  
18 subject matter is neither disclosed nor suggested in the references of record, either  
19 singly or in combination with one another.

20 Second, even if the cited references did disclose all the claimed subject  
21 matter, which they do not, the Office’s stated motivation “to get a full  
22 understanding [of] how to construct user interface of the client application,” is too  
23 general and could not serve as the basis for making any modification to Willie.  
24 Furthermore, this stated motivation is simply inapplicable to Willie, which is  
25 directed to programming in a language different than that of Perry. As such, this

1 stated motivation simply fails to explain why one skilled in the art would have  
2 been motivated to combine the teachings of the references. Therefore, Applicant  
3 respectfully submits that that a person of ordinary skill in the art, at the time of  
4 the invention, would not have reasonably looked to the teachings of Perry to  
5 modify Willie.

6 In view of the above discussion, the Office has not established a *prima*  
7 *facie* case of obviousness. Accordingly, for at least this reason, Applicant  
8 traverses this rejection and submits that claim 28 is allowable.

9 **Claim 29**, as amended [added language in bold italics], recites a method,  
10 comprising:

- 11 • managing network and computing resources for a distributed  
12 computing system;
- 13 • exposing a set of functions that enable developers to access the  
14 network and computing resources of the distributed computing system,  
15 the set of functions comprising functions to facilitate construction of  
16 user interfaces, wherein the functions are grouped into multiple  
17 namespaces that define a collection of classes which represent  
18 managed heap allocated data that has reference assignment semantics,  
19 interfaces that define a contract that other types can implement,  
20 delegates that are object oriented function pointers, enumerations  
21 which are value types that represent named constants and structures  
22 that represent static allocated data that has value assignment semantics;  
23 and
- 24 • using a common language runtime layer ***supporting*** applications  
25 written in ***one or more*** different languages ***and translated*** into an  
intermediate language supported by the common runtime layer.

22 In making out the rejection of this claim, the Office simply indicates  
23 "see rejection of claim 5 above." Applicant respectfully traverses this rejection  
24 and submits that the Office has not established a *prima facie* case of obviousness.  
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1 First, Applicant submits that the references do not collectively disclose all  
2 of the subject matter of this claim. For example, Applicant submits that claim 5  
3 does not recite "wherein the functions are grouped into multiple namespaces ...  
4 "as recited in claim 29. Accordingly, it appears that the Office has forgotten the  
5 claim language "wherein the application program interface groups API functions  
6 into multiple namespaces that define...value assignment semantics".  
7 Nevertheless, Applicant has thoroughly reviewed the Willie and Perry references  
8 and submits that this subject matter is neither disclosed nor suggested in the  
9 references of record, either singly or in combination with one another.

10 Furthermore, Applicant is unable to find any mention of "classes which  
11 represent managed heap allocated data that has reference assignment semantics"  
12 on pages 48-49 of Willie or "interfaces that define a contract that other types can  
13 implement" on pages 49-50 of Willie.

14 In addition, as noted above, even if the cited references did disclose all the  
15 claimed subject matter, which they do not, the Office's stated motivation is too  
16 general and is simply inapplicable to Willie. Therefore, Applicant respectfully  
17 submits that a person of ordinary skill in the art, at the time of the invention,  
18 would not have reasonably looked to the teachings of Perry to modify Willie.

19 Accordingly, in view of the above discussion, the Office has not  
20 established a *prima facie* case of obviousness. Hence, for at least these  
21 reasons, this claim is allowable.

22 **Claim 30** depends from claim 29 and is allowable as depending from an  
23 allowable base claim. This claim is also allowable for its own recited features  
24 which, in combination with those recited in claim 30, are neither disclosed nor  
25

1 suggested in the references of record, either singly or in combination with one  
2 another.

3 **Claim 31** recites a method, comprising creating a namespace with  
4 functions that enable drawing and construction of user interfaces, the name space  
5 defining classes which represent managed heap allocated data that has reference  
6 assignment semantics, interfaces that define a contract that other types can  
7 implement, delegates that are object oriented function pointers, structures that  
8 represent static allocated data that has value assignment semantics, and  
9 enumerations which are value types that represent named constants.

10 In making out the rejection of this claim, the Office relies on the teachings  
11 of Willie and Perry and argues that it would have been obvious to integrate the  
12 teachings of these references “to get a full understanding [of] how to construct  
13 user interface of the client application.”

14 Applicant respectfully traverses this rejection and submits that the Office  
15 has not established a *prima facie* case of obviousness.

16 First, Applicant submits that the references do not collectively disclose all  
17 of the subject matter of this claim. For example, the Office’s reliance on pages  
18 117-118 of Willie for disclosing “creating a namespace with functions that enable  
19 drawing and construction of user interfaces, the name space defining classes  
20 which represent managed heap allocated data that has reference assignment  
21 semantics, interfaces that define a contract that other types can implement,  
22 delegates ... structures ... and enumerations ...” is misplaced because these pages  
23 merely describe creating namespaces in general, but do not describe creating a  
24 namespace defining the subject matter of claim 31.

1 Furthermore, Applicant is unable to find any mention of “classes which  
2 represent managed heap allocated data that has reference assignment semantics”  
3 on pages 48-49 of Willie or “interfaces that define a contract that other types can  
4 implement” on pages 49-50 of Willie.

5 Second, as noted above, even if the cited references did disclose all the  
6 claimed subject matter, which they do not, the Office’s stated motivation is too  
7 general and is simply inapplicable to Willie. Therefore, Applicant respectfully  
8 submits that that a person of ordinary skill in the art, at the time of the invention,  
9 would not have reasonably looked to the teachings of Perry to modify Willie.

10 Accordingly, in view of the above discussion, the Office has not  
11 established a *prima facie* case of obviousness. Hence, for at least these  
12 reasons, this claim is allowable.

13 **Claims 32-40** depend from claim 31 and are allowable as depending  
14 from an allowable base claim. These claims are also allowable for their own  
15 recited features which, in combination with those recited in claim 31, are  
16 neither disclosed nor suggested in the references of record, either singly or in  
17 combination with one another:

### 18 **Conclusion**

19 Applicant respectfully submits that the Office has failed to establish a  
20 *prima facie* case of obviousness for the reasons set forth above. Applicant  
21 respectfully requests a Notice of Allowability be issued forthwith.  
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Respectfully submitted,

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Dated:

7/22/07

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